

1 PAUL S. PADDA, ESQ. (NV Bar #10417)

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3 **PAUL PADDA LAW, PLLC**

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7 Attorney for Defendant

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 SUNDANCE MEDIA GROUP, LLC,

11 Plaintiff,

12 vs.

13 YUNEEC USA, INC., Does I through X and  
14 Roe Corporations I through X inclusive,

15 Defendants.

Case No. 2:18-cv-0388-APG-BNW

**DECLARATION OF PAUL S. PADDA IN  
SUPPORT OF YUNEEC USA, INC.'S  
MOTION FOR ATTORNEYS FEES**

16 I, Paul S. Padda, Esq. do hereby declare the following:

17 1. I am an attorney licensed to practice law in Nevada (NV Bar #10417). I am also  
18 admitted to practice before this Court. I am offering this Declaration based upon my personal  
19 knowledge. I am above the age of 18 and am not a party to this litigation. I am competent to  
20 testify to the matters herein if called upon to do so.

21 2. This Declaration is being offered in support of Yuneec USA, Inc's motion for  
22 attorney's fees.

23 3. I received my undergraduate degree from the University of Chicago and my law  
24 degree from the University of Illinois. I am admitted to practice law in Nevada, California,  
25 Illinois and the District of Columbia.

26 4. My hourly rate is \$550.00 per hour. This is a reasonable rate for attorney's in  
27 Nevada with my experience. Prior to starting my own law firm in 2011, I spent over a decade  
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1 as a Trial Attorney and Assistant United States Attorney with the United States Department of  
2 Justice in Washington D.C. and Las Vegas, Nevada. I have significant federal litigation  
3 experience and routinely litigate civil and criminal cases in this Court and other federal courts.

4 5. My former associate Joshua Y. Ang, Esq., a graduate of the University of San Diego  
5 School of Law, had an hourly rate of \$275.00 per hour during the time he was associated with  
6 my law firm. Mr. Ang is also a Nevada licensed attorney (NV Bar #14026) and worked on this  
7 case.  
8

9 6. Between Mr. Ang and I we spent a total of 22.75 hours at an expense to the client of  
10 \$10,791.25 on this litigation as local counsel, excluding time billed relating to Plaintiff's default  
11 and the related attorneys' fees motion. Attached hereto as Exhibit A is a true and correct copy  
12 of our redacted billing summary statement reflecting the hours spent working on this matter. A  
13 copy of the unredacted bills shall be submitted to the Court *in camera*.  
14

15 7. For cases billed on an hourly basis, my firm's practice is to maintain billing  
16 statements of the kind submitted in this case. My firm bills to the tenth of the hour.  
17

18 I declare, under penalty of perjury, the foregoing is true and correct to the best of my  
19 knowledge and belief.

20  
21 

22 Paul S. Padda, Esq.

23 Dated: October 23, 2020  
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